

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Samuel Zean, Eunice Zean

Claimants.

Court File No: 0:17-cv-03817-
JNE/HB

vs.

Case File No. 0:17-cv-05117

David Madgett, Madgett Law, LLC

Respondents.

AFFIDAVIT OF DECLARATION

I, Eunice Zean, state that on 7/5/2017, I did not accompany my husband Samuel Zean at David Madgett's office and had not even met or seen David Madgett until a month after he had filed our lawsuit against Wells Fargo in August 2017 or September 2017.

I, Eunice Zean, state that, I did accompany my husband Samuel Zean at David Madgett's office and so, served as a witness when Samuel Zean signed Madgett Law LLC and David Madgett's Comcast representation agreement.

I Eunice Zean, state that the agreement that was given to Samuel Zean to sign by David Madgett was identical and an exact replica of our Wells Fargo agreement when we signed it on DocuSign. I further state that David Madgett had not signed the Comcast agreement when he handed it to Samuel Zean in my presence. The agreement did not have any modification to it whether typed written or handwritten and David Madgett didn't sign it after Samuel Zean had signed it.

I Eunice Zean, state that David Madgett instinctively told Samuel Zean that he would sign the agreement later and then email it to Samuel Zean that same day. He however, never did.

I Eunice Zean, am aware that David Madgett has not been true to his words in emailing his signed copy of the Comcast agreement to Samuel Zean as he had promised, to date.

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S. DISTRICT COURT ST. PAUL

I Eunice Zean, am aware that David Madgett has not been true to his words in emailing his signed copy of the Comcast agreement to Samuel Zean as he had promised, to date.

I Eunice Zean, am aware that Samuel Zean has made countless efforts to obtain David Madgett's signed copy of the Comcast representation agreement multiple times but to no avail.

I, Eunice Zean, state that the signature on the Trans Union's settlement agreement that David Madgett gave us recently on May 1, 2018, through Clio.com, is not my signature and is forged. Additionally, the date (1/10/2018) is not in my handwriting, nor is it Samuel Zean's known handwriting and was written by David Madgett. As such, even Trans Union settlement agreement is hereby altered.

I, Eunice Zean, state that David Madgett notarized the Experian's settlement agreement signing page after we left. The notary stamp/seal on the Experian's settlement agreement is forged, as we did not sign that agreement in the presence of any notary public, whether with David Madgett himself or anyone else. David Madgett did not sign the agreement himself when we did, did not type the word "**Date:**" on the agreement when we signed it, nor did he allow us to put the date in our writings. However, after we recently retrieved a copy of the agreement through Clio.com on May 1-5, 2018, we noticed that David Madgett had added a notary stamp/seal and dated the agreement in his own handwriting and put a signature that is noticeably different from his on the agreement in our absence. I declare under penalty of perjury that everything I have stated in this document is true and correct.

Minn. Stat. § 358.116.

Dated: 30th day of May 2018


EUNICE ZEAN
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